UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Jon Stainbrook,	)	Case No. 3:06CV2898
	)	
Plaintiff,	)	Judge David A. Katz
	)	
v.	)	**MOTION FOR EXTENSION OF TIME**
	)	**WITHIN WHICH TO MOVE, PLEAD**
Lions Gate Entertainment, et al.,	)	**OR OTHERWISE RESPOND TO**
	)	**PLAINTIFF'S COMPLAINT**
Defendants.	)	

* * *

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants Lions Gate Entertainment and Palm Pictures ("Defendants") move this Court for a thirty (30) day extension of time, until and including January 19, 2007, to move, plead or otherwise respond to Plaintiff's Complaint. Defendants have not been properly served with a summons and complaint, but received a copy of the complaint on December 7, 2006. Defendants have only recently obtained local counsel, and additional time is required to adequately prepare a response to the Complaint.

A proposed form of Order is lodged herewith.

SLK_TOL-#1168820

Dockets.Justia.com

/s/ Nathan A. Hall
H. Buswell Roberts, Jr. (0004747)
Nathan A. Hall (0077014)
SHUMAKER, LOOP & KENDRICK, LLP
1000 Jackson Street
Toledo, Ohio 43604-5573
Telephone: (419) 241-9000
Facsimile: (419) 241-6894

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **Motion for Extension of Time Within Which to Move, Plead or Otherwise Respond to Plaintiff's Complaint** has been served by electronically and/or by regular U.S. mail, postage prepaid, this 22nd day of December, 2006, upon Plaintiff Jon Stainbrook, *pro se,* 1758 Meadowlark Road, Toledo, Ohio 43614.

/s/ Nathan A. Hall
H. Buswell Roberts, Jr.
Nathan A. Hall
SHUMAKER, LOOP & KENDRICK, LLP

Attorneys for Defendants